



February 22, 2023

The Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square Room 430  
New York, NY 1000

Re: *Lynne Freeman v. Tracy Deeks-Elkenaney et. al.*, Case No. 22 Civ 2435 (LLS) (SN)

Dear Judge Netburn:

We represent the Plaintiff, Lynne Freeman, in the above captioned matter. We write pursuant to Rule III. F of Your Honor's Individual Practices regarding filing documents under seal.

The parties had a dispute about certain text messages redacted by certain of the Defendants. The Court asked the parties to agree on a way to handle the dispute or it would review certain of the material *in camera*. Pursuant to a letter dated December 16, 2022, the parties advised the Court that they agreed as follows: (1) Entangled Defendants and Prospect will send Mr. Passin a link via Microsoft OneDrive to the unredacted versions of their text messages, which shall be made available during fact discovery initially for two weeks of Mr. Passin's choosing, with the parties to discuss in good faith extending this review period for a reasonable period if necessary for Mr. Passin to complete his review; (2) these documents shall be treated as "CONFIDENTIAL" and "ATTORNEYS' EYES ONLY" whether or not they are marked as such; (3) the downloading function will be disabled and Mr. Passin agrees not to share this link with anyone else, including Plaintiff.

After reviewing some of the material marked "ATTORNEYS' EYES ONLY," plaintiff decided she needed to file a motion regarding the improperly redacted text messages. We have thus filed the Letter Motion under Seal and filed a redacted copy of the motion unsealed to protect any of the information referred to in the motion that was designated by Defendants as "ATTORNEYS EYES ONLY."

We thank the Court for its time and attention to this matter.

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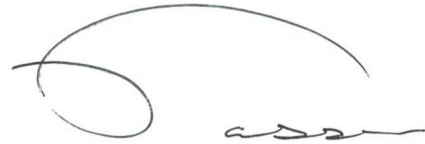
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Respectfully submitted,

**CSReeder, PC**



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